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**From:** Montgomery, Michael  
**Sent:** Wed 7/29/2015 12:35:58 AM  
**Subject:** Follow-up on Class I UIC coordination

Hi Jon –

As we have discussed we are hoping to set up a meeting with the WB and RWQCB 5 the week of August 10<sup>th</sup> to coordinate our actions involving existing and proposed EPA UIC permits. The 11<sup>th</sup>, 13<sup>th</sup> between 3-5 or the 14<sup>th</sup> in the afternoon work for us. Here is a short summary of what we would like to discuss;

#### Elk Hills Field

The Water Board's Feb 11, 2015 letter is being used by our Class I Permittee (Elk Hills Power) as evidence that they should be able to get an aquifer exemption for injection into the Tulare formation in the Elk Hills Field. We would like to understand the status of the conclusions reached in the Feb 11 letter as well as the timing for the State to reach a decision on Class II related exemptions in this field/formation. We would like to share our thoughts on options for this operator if there is not going to be a State supported exemption and get input from the WB/RWQCB.

#### Fruitvale Oil Field

It is our understanding that RB5 has active WDRs that authorize two oil refineries (Alon Refinery and San Joaquin Refinery) to inject into the Santa Margarita formation of the Fruitvale oil field. When the WDRs were issued in the early 1990s, the RB also removed the MUN beneficial use classification from this aquifer/formation (based at least in part on the mistaken belief that the entire SM formation in the Fruitvale field was exempt per the DOGGR primacy agreement). EPA is actively engaged with Alon regarding their application for a UIC permit, but we have no records or information about SJ refinery. We would like to understand what the RB is planning

to do with these two facilities. More specifically, we would like to discuss options for Alon which would be consistent with UIC class I requirements and also discuss an appropriate path forward for SJ that is compliant with the SDWA. Lastly we would like to discuss the current designation of this aquifer/formation.

Thank you,

Mike

Michael Montgomery

Acting Director - Water Division (July 6<sup>th</sup>, 2015 – September 4<sup>th</sup>, 2015)

US EPA Region 9

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